

Arc Ecology

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Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402
Attn: Mr. Richard Powell, Code 6221

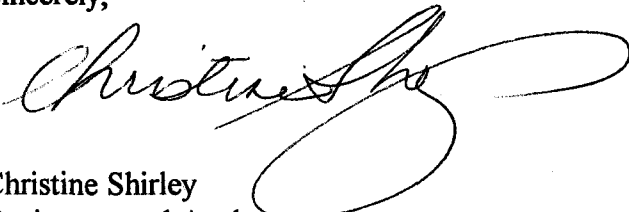
Dear Mr. Powell

Enclosed are my comments on the "Draft Technical Memorandum, Distribution of Bay Mud Aquitard and Characterization of the B-Aquifer in Parcel B, Hunters Point Shipyard, San Francisco," dated 18 February 1999.

1. I found the "no further action" recommendation confusing given that this document never states a hypothesis, or even what action might have been contemplated. Why was it deemed necessary to evaluate the presence and thickness of the Bay Mud aquitard? Why was a lack of this data considered a data gap?
2. Arsenic was found at 13.1 mg/kg in soil, slightly above "background" of 11.1 mg/kg. The Navy states on page 10 that this level of arsenic is considered a variation in natural background. Yet background threshold concentrations at Hunters Point Shipyard were estimated using the upper 95% confidence limit on the background dataset. Using this method any sample showing concentrations above background threshold falls within the contaminated population. Therefore, it is improper for the Navy to consider this sample uncontaminated because it reflects a variation in natural background concentration.
3. Page 11 states that TPH found in the water sample from boring IR07B054 is a result of decaying organic matter. This may be a typo. Is the correct boring number IR24014?

Thank you for providing us an opportunity to comment on this document.

Sincerely,



Christine Shirley
Environmental Analyst